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February 14, 2018

By *ECF*

Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 2/15/2018

Re: *United States v. Joo Hyun Bahn et al.*, 16 Cr. 831 (ER)

Dear Judge Ramos:

In consultation with the Probation Department, I write to seek an adjusted schedule for the Probation Department to disclose its draft and final Pre-Sentence Reports in the above-referenced case. The government has no objection to the below proposed schedule.

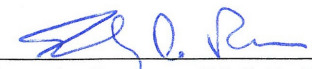
Mr. Bahn is scheduled to be sentenced on June 29, 2018, but based on the standard disclosure schedule (set in reference to the date a defendant pleads, not the date he is scheduled to be sentenced), the Probation Department's first disclosure is due March 1 and the final disclosure is due on March 29. I propose an amended schedule requiring the first disclosure in mid-april and the final PSR no later than May 29, 2018. The proposed schedule will ensure that the parties have adequate time to submit all of the materials to the Probation Department that are necessary for its complete investigation and will allow the parties adequate time to provide comments before the final disclosure.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Julia Gatto
Julia Gatto
Assistant Federal Defender
212.417.8750

The application is X granted
_____ denied


Edgardo Ramos, U.S.D.J.
Dated: 2/15/2018
New York, New York

cc: A.U.S.A.s Dennis Kihm/Daniel Noble (via ECF)
U.S.P.O. Ross Kapitansky (via email)